EXHIBIT A

Ilir Lecaj, a man 15 Juniper Street Ipswich, MA, 01938

Case # 1640 SC 000020

IPSWICH DISTRICT COURT SMALL CLAIMS

Ilir Lecaj, a man,) Plaintiff)	CASE NR:
Vs. Robert O. Magnuson (Resident) J.C.Christensen and Associates, Inc.	VERIFIED COMPLAINT FOR DAMAGE
, ,	JURY TRIAL DEMANDED
Defendant)	

Comes now, Ilir Lecaj, a consumer, claiming wrong doing by the defendant as follows;

INTRODUCTION

1. This claim is an action brought by the Plaintiff for violation of Consumer Protection Laws, Fair Credit Reporting Act (15 USC 1681), M.G.L. c. 93A §2, 940 CMR 7.00 and violation of MGL Ch.93, §66.

THE PARTIES

- 2. Plaintiff, Ilir Lecaj, is now and at all times relevant to this action an American National. Plaintiff is a "consumer" as that term is defined within 15 U.S.C. §1692a(3) and M.G.L. c. 93, §49, (940 CMR 7.00).
- 3. Defendant "J.C. Christensen and Associates, Inc" is debt collector, with principal place of business: 200 14th Avenue East, Sartell, MN, 56377. J.C. Christensen and Associates, Inc" is registered to do business in Massachusetts.
- 4. Defendant J.C. Christensen and Associates, Inc, is debt collector as the term is defined by FDCPA 1692a (6), and M.G.L. c. 93A, s. 2 (209 CMR 18.02) and furnishers of information per FCRA, 15 U.S.C. §1681s-2.



JURISDICTION AND VENUE

5. This court has jurisdiction under Massachusetts General Law chapter 93A, is referred to as the Consumer Protection Act. The law provides for actions by the Attorney General, or by individuals.

VENUE

6. The occurrences which give rise to this action occurred in Essex County, Massachusetts and Plaintiff resides in Essex County, Massachusetts. Venue is proper in the Ipswich District Court.

III. FACTUAL ALLEGATIONS

- 7. Plaintiff brings this action regarding the defendant in their continued attempts to collect an alleged debt defendant claim is owed to them. However Plaintiff is without knowledge of the alleged debt defendant's claim is owed.
- 8. On and about April 26, 2015 this Plaintiff received a dunning letter from the defendant J.C. Christensen and Associates, Inc. where is alleged that the Plaintiff "owes an account" to defendant. (See exhibit A).
- 9. On and about May 2, 2015 this Plaintiff served a Notice for Validation of Debt. The notice required the defendant J.C. Christensen and Associates, Inc to validate and verify their alleged debt pursuant to 15 USC§1692g. The Notice was received on May 6, 2015 by the Defendant J.C. Christensen and Associates, Inc. (see Exhibit B)
- 10. On and about June 2, 2015 this Plaintiff obtained his credit report from Experian and realized the defendant J.C. Christensen and Associates, Inc. has obtained Plaintiff's credit file on April 21, 2015 without a permissible purpose twice. One Credit Pull is under the "Inquiries Shared with Others" (Hard Pulls) and the other is under "Inquiries shared only with you" (soft pulls). (See exhibit C).
- 11. On and about July 4, 2015 this Plaintiff sent Intent to Sue letter to defendant J.C. Christensen and Associates, Inc. On this letter the Plaintiff expressed the will to resolve the matter amicably. (See exhibit D).
- 12. On and about July 20, 2015 this Plaintiff received an answer of his "Intent to Sue" letter from the defendant J.C. Christensen and Associates, Inc. where is explained the reason for the credit pull. According to Delilah Stellmach, JCC has completed the investigation and the Credit Inquiries are permissible pursuant to 1681(3)(a). (See exhibit E).

JJ

IL.

- 13. On and about July 16, 2015 this Plaintiff obtained another new credit report from Experian and realized the defendant J.C. Christensen and Associates, Inc. has not removed the credit pulls from the credit report. (See exhibit F).
- 14. Accordingly the discovery of the violations stated herein occurred on April 21, 2015, and are within the statute of limitations as defined in the FCRA, 15 USC§1681p.

IV. FIRST CAUSE OF ACTION VIOLATION OF 15 U.S.C.§1681b(f) FCRA and MGL Ch.93, §51(3) UNPERMISSABLE CREDIT INQUERIES (J.C.CHRISTENSEN AND ASSOCIATES, INC.)

- 15. Paragraphs 1-14 are re-alleged as though fully set out herein.
- 16. Plaintiff is a "consumer" within the meaning of the FCRA, 15 U.S.C.§1681a(c).
- 17. J.C. Christensen and Associates, Inc is a furnisher of information within the meaning of the FCRA, 15 USC. §1681s-2.
- 18. Experian is a consumer reporting agency as defined in 15 U.S.C. §1681(f), regularly engaged in the business of assembling, evaluating, and disbursing information concerning consumers for the purpose of furnishing consumer reports as defined in 15 U.S.C. §1681(a)(b), to third parties for monetary compensation.
- 19. J.C. Christensen and Associates, Inc violated FCRA by obtaining Plaintiff's credit report. FCRA's permissible purpose gives right to enquire the credit file only on behalf of the Creditor. J.C. Christensen and Associates, Inc violated twice the FCRA by obtaining Plaintiff's credit file. J.C. Christensen and Associates, Inc and Experian willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:
 - (a) J.C. Christensen and Associates, Inc willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by15 U.S.C. §1681b.
 - (b) Experien willfully violated 15 U.S.C. §1681b by furnishing Plaintiff's consumer report without a permissible purpose as defined by15 U.S.C. §1681b.



- 20. On the FTC Staff Report with Summary of Interpretations "40 Years of Experience with the FDCPA", page 44 (3)(B), FTC and later supported by CFPB, defines the "permissible purpose". Here is what in short says: (see Exhibit G)
- B. Debt collection. A collection agency, detective agency, private investigator, or attorney has a permissible "collection" purpose under this section to obtain a consumer report on a consumer for use in obtaining payment of that consumer's account on **behalf of a creditor**. A creditor may obtain a consumer report on an existing account to formulate its collection strategy. An attorney collecting a debt for a creditor client has a permissible purpose to obtain a consumer report on the debtor to the same extent as the client.
- 21. Plaintiff has endured significant economic harm as a result of the erroneous credit reporting and failure to verify and or validate their alleged debt although requested.
- 22. WHEREFORE, Plaintiff demands judgment for damages against J.C. Christensen and Associates, Inc for actual or statutory damages \$1000 per violation, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

SECOND CAUSE OF ACTION INVASION OF PRIVACY – VIOLATION OF MGL Ch.93, §66

J.C. Christensen and Associates, Inc

- 23. Paragraphs 1-36 are re-alleged as though fully set out herein.
- 24. Defendant J.C. Christensen and Associates, Inc is a "debt collector" and a stranger to the Plaintiff. Plaintiff has no contractual relationship with this defendant, and has never applied for credit or services with this defendant.
- 25. On or about April 21, 2015, defendant J.C. Christensen and Associates, Inc, illegally obtained Plaintiff's consumer credit report of mine. Defendant J.C. Christensen and Associates, Inc is NOT a creditor, therefore defendant illegally obtained Plaintiff's consumer credit report constitutes a Tort claim for Invasion of Privacy.
- 26. The Plaintiff's right to privacy is also an enumerated Constitutional right, both in the Commonwealth and Federal Constitution. Plaintiff has been damaged in that their proprietary, confidential, most personal information was unlawfully and illegally breached by defendant J.C. Christensen and Associates, Inc. Importantly Plaintiff is most concerned with the fact that Plaintiff "did not" provide his social security numbers to either defendant. Plaintiff supports this assertion by the mere fact that no credit, no account, no debt, no application or services was applied nor received from the defendant.



V.

- 27. Plaintiff has the right to discovery, to determine where defendant obtained his personal, private information from. Specifically Plaintiff will investigate through COMPLAINT FOR DAMAGES discovery where defendant obtained Plaintiff's social security number from, and what additional proprietary information was obtained by the defendant illegally and unlawfully, and how that information is being used. Defendant J.C. Christensen and Associates, Inc may also be guilty of identity theft under state and federal law.
- 28. Massachusetts further recognizes the Plaintiff's right to be free from invasions of privacy, thus Defendant violated Massachusetts General Law Chapter 93, §66 that says:

Section 66. Any person who knowingly and willfully obtains information relative to a consumer from a consumer reporting agency under false pretenses shall be punished by a fine of not more than \$5,000 or by imprisonment for not more than one year, or both.

PLAINTIF DEMANDS WHEREFORE

Plaintiff demands judgment be entered against Defendant: J.C. Christensen and Associates, Inc

- 1. Statutory violations and actual damages, punitive damages, attorney's fees and costs of \$1,000, pursuant to 15 U.S.C. §1681n (a) (3) and 15 U.S.C. §1681o (a).
 - 2. Statutory violations pursuant MGL Ch. 93 Sec.66 \$5,000 for invasion of privacy.
 - 3. Double or treble damages plus reasonable attorney's fees pursuant to M.G.L. c. 93A § 3(A);
 - 4. Punitive damages, compensatory damages in an amount determine by law;
 - 5. Such other and further relief as may be just and proper determine by law, at trial, or by the court.

I state under penalty of perjury, under the laws of the United States of America that the forgoing is true and correct.

Page 5 of 6

Date Feb 16, 2016

By Consumer Claimant

55

SWORN AFFIDAVIT OF FACTS

I, Ilir Lecaj, hereby declare, swear and affirm the facts listed below are true and undisputed:

- 1. That: on April 21, 2015 J.C. Christensen obtained twice my credit file with Experian Credit Bureau.
- 2. That: I, Ilir Lecaj, on April 26, 2015 received a dunning letter from J.C. Christensen.
- 3. That: on May 2, 2015, I, Ilir Lecaj, served J.C. Christensen with a Dispute of Debt letter.
- 4. That: on July 4, I sent an "Intent to Sue" letter to J.C. Christensen.
- 5. That: in July 20, I received an answer of my Intent to Sue letter from J.C. Christensen.
- 6. That: I obtained a new Credit Report with Experian and the Credit Inquiries were still in my credit.

There is no doubt that J.C. Christensen and Associates Inc. violated FCRA and Massachusetts General Law Chapter 93, §66 and FDCPA for trying to collect an un-validated and un-verified debt.

forgoing is true and correct. Date Feb 14, 20/6	By Consumer, Claimant
	<u>JURAT</u>
Massachusetts Commonwealth)
Essex county)
identification, which were <u>NRSS</u> is the preceding or attached document is contents of the document are truthful	proved to me through satisfactory evidence of or incomplete or to be the person who signed in my presence, and who swore or affirmed to me that the and accurate to the best of his knowledge and belief.
(Official signature and seal of Notary Any III History Any II History Any III History Any III History Any III History Any II History Any	Notary public: WITNESS my hand and official seal. Signature of Notary Public

J.C. Christensen & Associates, Inc.

PO Box 519 • Sauk Rapide MN 56379

www.JCCSecurePsy.com Call us toil free at 1-866-811-9203 (CT) Monday - Tueeday: 8am - 8pm Wedneeday: 8am - 6pm Thursday - Friday: 8am - 7pm

Saturday: 8am - 12pm

Original Acct #. File Number: Regarding:

18480575

Capital One Bank (USA) N.A.

Account Information

Current Creditor(s): Cavalry SPV I LLC Amount Owed:

\$2958.92

EXHIBIT A1

NOTICE OF COLLECTION AND SPECIAL OFFER

April 22, 2015.

Dear ILIR LECAJ.

Your Capital One Bank (USA) N.A. has been purchased by Cavairy SPV I LLC and placed with us for collection. Our services have been contracted to represent in the recovery efforts of your delinquent account. Our records indicate that the outstanding balance on your account is. \$2958.92.

In an effort to resolve this matter as quickly as possible we have been authorized to negotiate GENEROUS SETTLEMENT TERMS on this account. Please review the following settlement opportunities to make voluntary resolution of your account a reality:

OHOTH

Settle your account for a lump-sum payment of \$2,219.19. That is a savings of 25% on your outstanding balance.

0.700.62

Extend your time and settle your account in 6 monthly payments of \$419.18. This is a savings of \$443.84 on your outstanding account balance. Further extend your time and pay your balance in full in 12 payments of \$246.58.

の部の報え

To resolve your debt online, please visit us at www.JCCSecurePay.com.

To take advantage of this opportunity to settle your account, cell Trevor Branson at 1-856-511-9203. As long as you haven't made other arrangements to repay this debt, you may be eligible for this offer. This offer is valid for 40 days from the date on this letter. If you wish to make a payment proposal after that time, please call us to discuss it. We are not obligated to renew this offer. The opportunities listed above do not alter or amend your validation rights as contained in this document.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.



Please call 1-866-811-9203 to see how you can best resolve your situation.



Mail all checks and payments to: J.C. CHRISTENSEN AND ASSOCIATES, INC. PO BOX 519 SAUK RAPIDS MN 58379-0519



To resolve your debt online, please visit us at: www.JCCSecurePay.com

SEE REVERSE SIDE FOR IMPORTANT INFORMATION AND PAYMENT OPTIONS

PLEASE DETACH AND RETURN LOWER PORTION WITH YOUR PAYMENT.

24ONLCCA010TV1N75

ONJCCA01 PO Box 1022 Wixom MI 48393-1022 ADORESS SÉRVICE REQUESTED

Please visit us at: www.JCCSecurePay.com

Please be aware that if the amount of debt forgiven as a result of settlement is equal to or greater than \$800.00; your current creditor may be required by internal Revenue Code Section 6050P to report the forgiven debt to the IRS and issue a form 1099c. If you have any questions regarding your personal taxes, it is recommended you consult with a certified public accountant or other tax professional.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Notice of Important Rights: You have the right to make a written or oral request that talephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only len (10) days unless you provide written confirmation of the request postmarked or delivered within seven (7) days of such request. You may terminate this request by writing to the debt collector. J.C. Christensen & Associates, Inc. PO Box 519 Sauk Rapids MN 56379...

DTV1N75

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PAYMENT OPTIONS

- Go to Western Union Quick Collect. Code City: JCC, MN
- Pay by phone: 1-868-811-9203 or visit: www.JCCSacurePay.com
- Pay with VISA, MasterCard, American Express or Discover by completing and returning sections 1 and 2 in the form below.
- INDICATE ADDRESS CORRECTIONS BELOW (Section 2)

EXHIBIT B1

Ilir Lecaj 15 Juniper Street Ipswich, Massachusetts 01938

VIA Certified Mail# 7014 0150 0000 8645 3413

J.C.Cristensen And Associates, Inc P.O Box 519 Sauk Rapids, MN, 56379-0519

Carry .

DISPUTE THE VALIDITY OF DEBT

RE: Your letter dated April 22, 2015

Your account # 18480575

To: J.C.Cristensen And Associates, Inc

Greating.

I got this communication from your office, (see attached copy), you say I own you \$2958.92. I do not recall that you loaned me any amount or provided any service.

Can you please validate and verify the debt?

If you sell this debt, please mark it **DISPUTED**.

You do not you have my permission to obtain my credit or report trade line with the CRA-s.

Thank you

Ilir Lecaj Thi Kecaj

Date 4/28/2015

2/18/2016

USPS.com@ - USPS Tracking@

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USPS Tracking®



Customer Service > Have questions? We're here to help.



Available Actions

Get Easy Tracking Updates > Man up for My USPS.

Tracking Number: 78140158000086483413

Updated Delivery Day: Wednesday, May 6, 2015

Product & Tracking Information

First-Class Mail®

Cortfled Mail W

DATE & TOME

STATUS OF ITEM

Arrived at USPS Facility

Departed Post Office

LOCATION

May 6, 2015 , 8:42 em

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SAUK RAPIDS, MN 56376

Your item was delivered at 8:42 am on May 8, 2015 in SAUK RAPIDS, MN 56379.

May 6, 2015 , 7:00 am May 6, 2016 , 6:59 mm Arrived at Unit May 1, 2015 , 5:01 am Departed USPS Facility Arrived at USPS Origin April 30, 2015 , 11:56 pm Facility Departed USPS Facility April 30, 2015 , 7:01 pm Arrived at USPS Origin April 30, 2015 , 9:39 am Facility April 29, 2015 , 12:11 am Departed USPS Facility

Available for Pickup SAUK RAPIDS, MN 56379

SAUK RAPIDS, MN 58379

WAITE PARK, MIN 56387

WAITE PARK, MN 58387

MINNEAPOLIS, MN 85401

MINNEAPOLIS, MN 55401

BOSTON, MA 02205

BOSTON, MA 02205

ROWLEY, MA 01969

ROWLEY, MA 01969

Track Another Package

Tracking (or receipt) member

April 26, 2015 , 8:51 pm

April 28, 2015 , 1:07 pm

April 28, 2015, 12:35 pm

70140150000006453413

Manage Incoming Packages

Sign up for My USPS >



PO Box 9701 Allen; TX 75013



0000736 m No observiento 60713701936163219 - CORPORISE ILIR LECAJ 15 JUNIPER ST IPSWICH MA 01938-1632

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Scan me with your smart phone for special offers from Experian

this credit report. Your credit information can change over time, in response to your recent request, we're pleased to send you Date: June 02, 2015 Report number: 1088-5110-53

so we recommend you keep track of any changes by signing up

for credit monitoring at experian.com/monitor.

credit report

Your personal

Prepared for: ILIR LECAJ

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EXHIBIT C1 Page 1 of 20.

Contents

- About the information in this report
- Toots to manage your personal credit
- Disputing information in this report
- Your accounts in good standing

Your accounts that may be considered negative

Record of requests for your credit history

6

- 18 Your personal information
- mon stridsig 64.
- 20 Notification of Rights

For-your attention interpation directly and easily within the online sistainy palipre. You may also dissult in oth

EXHIBIT C2



Prepared for: ILIR LECAJ Date: June 02, 2015 Report number: 1068-5110-53 Page 16 of 20

Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by lew. Experisn may list these inquiries for up to two years.

inquiries shared with others

The section below lists all of the companies that have requested your credit information as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that receive your credit history.

Examples of inquiries shared with others include:

- · a real estate loan
- a home mortgage loan
- en auto loan
- · an application for credit

TO BANK N.A. 5 COMMERCE PARK N BEDFORD NH 03110 (630) 647 2111

a identification number:

0002088540

J C CHRISTENSEN & ASSOC 200 14TH AVE E SARTELL MN 66377 (320),253 7800

Address identifi tion number:

0002086540

DISCOVER FINANCIAL SERVI PO BOX 15316 WILMINGTON DE 19850 (600) 347 2583 Address identification number:

0002086540

Date May 8, 2015

. 3/50

Unspecified. This inquiry is echeduled to continue on record until Jun 2017.

Apr 21, 2015

Unspecified. This inquiry is scheduled to continue on record until May 2017.

Date Jun 29, 2013

Unspecified. This inquiry is scheduled to continue on record until Jul 2015.

inquiries shared only with you You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others

- We offer credit information about you to those with a permissible purpose, such as:

 other creditors who want to-offer you preapproved credit;

 an employer who wishes to extend an offer of employment;

 a potential investor in assessing the risk of a-current obligation;

 Experien Consumer Assistance to process a report for you;

 your current creditors to monitor your accounts (date licted may reflect only the most recent request)

These inquiries DO NOT affect your credit score.

CHASE CARD PO BOX 15296 WILMINGTON DE 19850

(800) 432 3117

Data of inquiry: May 21, 2015

AMERICAN EXPRESS PO BOX 981537 EL PASO TX 79998

(802) 537 8500

Date of inquiry: May 20, 2015; Apr 28, 2015; Mar 18, 2015; Feb 18, 2015; Jan 29, 2015; Dec 12; 2014

TO BANK N.A. ONE HERITAGE SQ PORTLAND ME 04112 (800) 498 4481

Date of inquiry: May 12, 2015

TO BANK NA 64 CENTRAL ST FOXBORO MA 02035

(508) 543 5300

Date of Inquiry: May 12, 2015

CHASE CARD PO BOX 15298 WILMINGTON DE 19850

(600) 432 3117

Date of inquiry: May 08, 2015



Prepared for: ILIR LECAJ Date: June 02, 2015 Report number: 1068-5110-53 Page 17 of 20

J C CHRISTENSEN & ASSOC 200 14TH AVE E SARTELL MN 58377 (320) 253 7800 Date of Inquiry: Apr 21, 2015 TO BANK N.A. 32 CHESTNUT ST LEWISTON ME 04240 (207) 755 4376 Date of Inquiry: Mar 23, 2016 FIRST NATIONAL BANK OF OMAHA, 1620 DODGE ST OMAHA NE 68102 SANTANDER BANK NA 450 PENN READING PA 19801 (877) 768 2265 (402) 342 2265 Date of inquiry: Jan 09, 2015 Date of inquiry; Jan 08; 2014 EXPERIAN POBOX 9800 ALLEN TX 75013 BK OF AMER PO BOX 17054 WILMINGTON DE 18850 (800) 311 4789 Date of Inquiry: Oct 31, '2014; Jul 16, 2014; May 13, 2014; Apr 25, 2014; Mer 26, 2014; Aug 26, 2013; Oct 21, 2011; Oct 14; 2011; Dec 23, 2009 (800) 421 2110 Date of inquiry: Dec 08, 2013 TRANSUNION INTERACTIVE 100 CROSS ST STE 202 SAN LUIS OBISPO CA. TRUELINK 100 CROSS ST STE 202 SAN LUIS OBISPO CA 93401 93401 (805) 782 8282 Date of inquiry: Nov 19, 2013; Sep 08, 2013 (605) 762 8282 (805) 782 8282
Date of Inquilry: Aug 23, 2014; Jun 26, 2014; Jun 25, 2014; Jun 17, 2014; Jun 15, 2014; Jun 04, 2014; May 30, 2014; May 29, 2014; May 16, 2014; May 14, 2014; May 08, 2014; May 07, 2014; May 08, 2014; May 07, 2014; May 08, 2014; May 07, 2014; May 08, 2014; Apr 08, 2014; Apr 08, 2014; Apr 08, 2014; May 08, 2014; Mar 27, 2014; Mar 28, 2014; Mar 08, 2014; Mar 08, 2014; Mar 08, 2014; Mar 01, 2014; Mar 01, 2014; Mar 01, 2014; Feb 08, 2014; Feb 08, 2014; Feb 09, 2014; Feb 09, 2014; Jan 08, 2014; Jan 2014; TRANSUNION INTERACTIVE No phone number avallable Date of inquiry: Sep 06, 2013 TCM BANK NA 2701 N ROCKY POINT DR STE 700 TAMPA FL 33607 (813) 287 4860 Date of inquiry: May 02, 2014

0844560859.

NOT US AN ORDER ABOUT TO THE

EXHIBIT D1

Ilir Lecaj 15 Juniper Street Ipswich, Massachusetts 01938

VIA Certified Mail# 7015 0640 0007 9064 2469

J.C.Cristensen & Associates, Inc P.O Box 519 Sauk Rapids, MN, 56379-0519

NOTICE OF INTENT TO SUE

To: J.C. Cristensen And Associates, Inc

Greating.

Recently I ordered my credit reports, going through it I discovered that your Law Firm,

J.C.Cristensen & Associates, Inc, has obtained my credit with Experian Credit Bureau, on

April 21, 2015. I am attaching a redacted copy of the page that shows the inquiry. I do not recall
applying for any credit, insurance, employment or getting any service from your firm. I deem the
inquiry to be non-permissible.

By obtaining my credit without a permissible purpose you have violated FCRA, 15 U.S.C. § 1681b (f) and Massachusetts General Law (MGL) c.93A.

I have the intention to sue your firm under FCRA, FDCPA and MGL but I am willing to settle this matter amicably without having to file suit and am giving you 15 days from receipt of this letter to take the opportunity to do so. If J.C.Cristensen & Associates, Inc chooses not to settle the matters at hand, then I will have no choice but to file suit and seek my remedy in a court of law.

I can be reached via email at ilecai@ifisoft.net.

This email address is to be used only for this purpose and no other matters.

Respectfully,

Hir Lecaj Wir Xeraj

Date 07/04/2015

2/16/2016

USPS.com@ - USPS Tracking@

Register / Sign in .

國USPS.COM

Exhibit D2

USPS Tracking®



Customer Service: Have questions? We've here to help.



Available Actions

Get Easy Tracking Updates > Sign up for My USPS.

Tracking Number: 70150640000790642469

On Time

Expected Delivery Day: Thursday, July 9, 2015

Product & Tracking Information

Postal Product: First-Class Mail®

Cartified Mail

DATE & TIME

STATUS OF ITEM

LOCATION

July 8, 2015 , 8:44 mm

Delivered

SAUK RAPIDS, MN 56378

The second secon

Your item was delivered at 8:44 am on July 9, 2015 in SAUK RAPIDS, MN 58379.

July 9, 2015 , 8:00 am July 9, 2015 , 7:55 am . July 9, 2015 , 7:55 em July 9, 2015 , 4:44 am July 8, 2015 , 10:37 pm July 8, 2015 , 7:01 pm

July 8, 2015 , 4:32 pm

July 7, 2015 , 9:39 am

July 5, 2015 , 11:47 pm

July 8, 2015 , 5:10 pm July 6, 2015 , 10:34 mm **Sorting Complete** Available for Pickup

Departed USPS Facility

Arrived at USPS Origin

Departed USPS Facility Antived at USPS Origin

Departed USPS Facility

Arrived at USPS Fecility

Departed Post Office

Arrivad at Unit

SAUK RAPIDS, MN 56379 SAUK RAPIDS, MN 58379 SAUK RAPIDS, MN 56379

WAITE PARK, MN 58387

WAITE PARK, MN 56387

MINNEAPOLIS, MIN 55401

MINNEAPOLIS, MIN 55401

BOSTON, MA 02205

BOSTON, MA 02205

PSWICH, MA 01938

PSWICH, MA 01938 Acceptance

Track Another Package

Tracking (or receipt) number

70150640000790842468

Track it

Manage Incoming Packages

No tracking numbers necessary.

Sign up for My USPS;





200 14th Avenue East | Sartell, MN 56377 p800-692-7374 | 1320-253-7860 | www.arrayag.com

EXHIBIT E

July 20, 2015

Ilir Lecaj 15 Juniper St Ipswich, MA 01938

Re: | ICC Account #: 18480575

Current Creditor: Cavalry SPV I, LLC Original Account Ending: 0617

Original Creditor: Capital One Bank, N.A.

Dear Ilir Lecaj,

J. C. Christensen and Associates, Inc. ("JCC") has completed its investigation regarding your recent credit bureau report inquiry.

The above account was placed with J.C. Christensen & Associates, Inc. ("[CC") for collection ("Account"). The initial collection notice mailed to you included the required language under the Fair Debt Collection Practices Act ("FDCPA") setting forth your right to dispute the debt and demand verification of the debt.

The Fair Credit Reporting Act ("FCRA") outlines under what circumstances a consumer report can be accessed. Under Section 1681b(3)(a) of the FCRA a permissible purpose is listed as: intends to use the information in connection with a credit transaction involving the consumer on whom the information is to be furnished and involving the extension of credit to, or review or collection of an account of, the consumer. Thus, JCC had a permissible purpose.

If I can be of further assistance, please don't hesitate to contact me at 320-534-3614.

Regards,

Delilah Stellmach Compliance Director

This communication is from a debt collector and is made for the limited purpose of responding to your dispute. This is NOT an attempt to collect a debt.

Array Services Group, Inc. CareCell, Inc. | ProSource Billing, Inc. | J.C. Christensen and Associates, Inc.

EXHIBIT F1

1

Experian Award of Intelligit

Prepared for: ILIR XHEMAL LECAJ Date: July 16, 2015

Report number: 1339-6399-05

Dear ILIR XHEMAL LECAJ,

To assist, you'in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit record.

GREEN TREE SERVICING

PLEASE REFER TO YOUR CREDIT REPORT FOR UPDATE-

Scan me with your smart phone for special offers from Experien-

We are responding to your request to remove a name or Social Security number on your personal predit report. We store information based on identification information provided to us by credit grantors or from information contained in public records. One or more sources of information reported the information you questioned and it is a part of your credit history.

If you believe a name or Social Security number in your credit report is inaccurate, you may want to contact the source of the information directly. Please contact us by phone at 1 (800) 509-8495 if you need additional assistance to determine the specific source of this particular information on your credit report.

You will not receive this explanation again if you dispute this same item within the next 30 days.

We store address information as it is sent to us by your credit grantons or from information contained in public records. One or more sources of information reported the address you questioned and it is a part of your credit history.

If you believe an address in your credit report is inaccurate, you may want to contact the source of the information directly. Please contact us by phone at 1 (800) 509-8495 if you need additional assistance to determine the specific sources of particular address information on your credit report.

You will not receive this explanation again if you dispute this same item within the next 30 days.

Items on your report that are considered to be "potentially negative", such as late payments, accounts included in bankruptcles, public record items, collections, unpaid or gold in settlement, charge-off, etc., could be considered less favorable or require closer review by companies reviewing your credit history.

Potentially negative items are listed under a separate heading in your personal credit report for your own reference. On credit reports provided to others with a permissible purpose, potentially negative items are not grouped into a separate section.

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